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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**ORIGINAL**

In the Matter of )  
 )  
Advanced Television Systems )  
and Their Impact Upon the ) MM Docket No. 87-268  
Existing Television Broadcast )  
Service )  
  
To: The Commission

**OPPOSITION TO PETITION FOR RECONSIDERATION**

Apple Valley Broadcasting, Inc. ("Apple Valley"), KHQ, Incorporated ("KHQ"), and Spokane Television, Inc. ("Spokane Television")(collectively, the "Caucus Parties"), by their attorneys, hereby respectfully oppose the Petition for Reconsideration ("Petition") filed by Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network ("Trinity") in response to the Commission's Sixth Report and Order ("Sixth R&O"), FCC 97-115, released April 21, 1997, 62 Fed. Reg. 26684 (May 14, 1997) insofar as it proposes alternative DTV channel assignments for full power television stations KAPP-TV, KHQ-TV and KXLY-TV.<sup>1</sup> In support whereof, the following is respectfully stated:

The Caucus Parties are members of the Eastern Washington and Northern Idaho DTV Channel Allocation Caucus (the "Caucus"), a coalition of full power television stations in Spokane and Yakima, Washington and surrounding communities which seek reconsideration

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<sup>1</sup> Apple Valley, KHQ and Spokane Television are licensees of full power television stations KAPP-TV (NTSC Ch.35; FCC DTV Ch.34), Yakima, WA; KHQ-TV (NTSC Ch.6; FCC DTV Ch.55), Spokane, WA; and KXLY-TV (NTSC Ch.4; FCC DTV Ch.54), Spokane, WA.

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of the Sixth R&O to the extent it allots and assigns paired digital channels in their region and propose implementation of a negotiated alternative DTV channel allocation plan comprised of all affected full power television stations. See Petition for Reconsideration filed by the Caucus on June 13, 1997. As demonstrated in the Caucus' Petition, this negotiated DTV channel proposal resolves a number of flaws in the FCC's DTV Table of Allotments for the eastern Washington and northern Idaho region and meets the Commission's criteria for DTV table modification.

Trinity's Petition proposes alternative DTV channel allocations for the Caucus Parties' stations which conflict with those proposed by the Caucus.<sup>2</sup> As stated in the Caucus' Petition, the Caucus' DTV channel plan was designed with the goal of minimizing adverse impact to LPTV stations and translators, and the Caucus intends to continue efforts to accomodate these secondary services. To this end, the Caucus Parties invite Trinity to supplement its Petition before the August 22, 1997 deadline for filing alternative DTV channel proposals in order to coordinate its proposed Yakima and Spokane DTV channels with those proposed by the Caucus.

In short, the Caucus Parties are ready and willing to work with Trinity to accomodate Trinity's translators in Yakima and

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<sup>2</sup> Trinity also proposes an alternative DTV channel for full power television station KCDT (NTSC Ch.26; FCC DTV Ch.56), Coeur D'Alene, ID, authorized to the Idaho State Board of Education, another member of the Caucus. In the case of KCDT, both Trinity and the Caucus propose the same alternative DTV channel.

Spokane, Washington and numerous other translators and low power television stations in the area. However, insofar as Trinity's present proposal conflicts with the Caucus' negotiated alternative DTV channel allocation plan, the Caucus Parties respectfully oppose Trinity's Petition.

**WHEREFORE,** Apple Valley, KHQ and Spokane Television respectfully oppose Trinity's Petition for Reconsideration with respect to the alternative DTV channels Trinity presently proposes for full power television stations KAPP-TV, KHQ-TV, and KXLY-TV.

Respectfully submitted,

**APPLE VALLEY BROADCASTING, INC.**

**SPOKANE TELEVISION, INC.**

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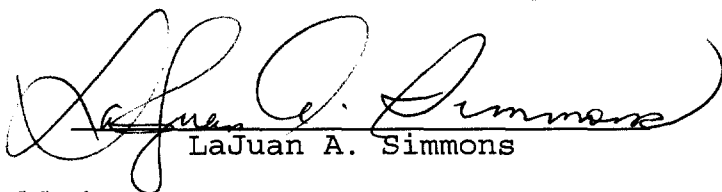
Their Attorneys

**CERTIFICATE OF SERVICE**

I, LaJuan A. Simmons, a Legal Secretary with the law firm of Rini, Coran & Lancellotta, P.C., hereby certify that on this 18th day of July, 1997, copies of the foregoing "Opposition to Petition for Reconsideration" have been served upon the following:

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